

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D.)
BROWN, DEONTAE TATE, JEREMY S.)
MELTON, ISSACCA POWELL, KEITH)
BURGESS, and TRAVIS BOYD on behalf)
of themselves and all similarly situated)
persons,)

Plaintiffs,)

v.)

BILL OLDHAM, in his individual capacity)
and in his official capacity as the Sheriff of)
Shelby County, Tennessee; ROBERT)
MOORE, in his individual capacity and in)
his official capacity as the Jail Director of)
Shelby County, Tennessee; CHARLENE)
MCGHEE, in her individual capacity and)
in her official capacity as the Assistant)
Chief of Jail Security of Shelby County,)
Tennessee; DEBRA HAMMONS, in her)
individual capacity and in her official)
capacity as the Assistant Chief of Jail)
Programs of Shelby County, Tennessee;)
SHELBY COUNTY, TENNESSEE, a)
Tennessee municipality; and TYLER)
TECHNOLOGIES, INC., a foreign)
corporation,)

Defendants.)

Civil Action No.
2:16-cv-02907-SHM-tmp
Jury Demanded

**MOTION FOR PARTIAL JUDGMENT ON THE PLEADINGS OF
DEFENDANTS BILL OLDHAM, ROBERT MOORE, CHARLENE MCGHEE,
AND DEBRA HAMMONS AS TO THE SECOND AMENDED CLASS ACTION
COMPLAINT**

Defendants Sheriff Bill Oldham, Robert Moore, Charlene McGhee, and Debra Hammons (hereinafter “Individual Defendants”), in their individual capacities, move this Court for a Partial Judgment on the Pleadings pursuant to Federal Rule of Civil Procedure 12(c). In support of their Motion, the Individual Defendants rely on their Memorandum in Support attached hereto.

Respectfully submitted,

s/ Amber D. Floyd

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Certificate of Service

I certify that the foregoing is being filed via the Court's ECF system this 25th day of May, 2017, for service on all persons registered in connection with this case, including:

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